

# EXHIBIT 90

# The data we collect, how it's used, and who we share it with

We care about your privacy and want to help you understand how we collect, use, and share your personal information. The data practices described in our Privacy Center apply to both patrons and creators.



Issa Rae

Show me how the Privacy Center works →

**PATREON**

Data  
Prac  
tices

Priv  
acy  
Polic

y

View  
Past  
Requests

Make a  
Privacy  
Request

**PATREON  
PRIVACY  
POLICY**

Welc...

Infor...

Pat...

## Patreon Privacy Policy – Past Version

Effective Date: **November 18, 2020**

Patro...

Creat...

Additi...

Infor...

How ...

Infor...

Infor...

Infor...

Infor...

Your ...

Com...

Com...

Exerc...

Acco...

Cont...

Estab...

Prohi...

Our D...

Secur...

Child...

# Welcome to Patreon!

Patreon is a platform where patrons can support and engage with creators. This updated Privacy Policy applies to patrons, creators and all users of our platform, and is part of our [Terms of Use](#).

Patreon is a global company. By using our platform, you agree that your personal information that you provide directly to us, or that we collect through your use of the platform, may be transferred to and stored in the United States and handled as described in this Policy.

## Information You Provide Through Your Account

This is information that you provide to us through text fields, such as your name, payment information and benefits. The information we collect differs depending on whether you make an account, become a patron or become a creator.

- First and Last Name
- Email Address
- Username
- Password
- State and Country of Residence

## We're taking a different approach to privacy

Show Me

You may also sign up using a Facebook or Google account. We will ask for permission to access basic information from your Facebook or Google account, such as your name, email and profile picture. You can choose to stop sharing that information with us at any time by going to Facebook or Google to remove Patreon's access to that account and your ability to log in.

You also have the option to add more information to your public profile, such as a location, social media links and an about section, which we store along with any comments or messages you submit on Patreon.

## Patrons

A patron is someone who joins Patreon's membership platform to support a creator's membership content. As a patron you must provide your payment information to our payment processors. You can see the Privacy Policy for these payment processors on the [PayPal](#), [Stripe](#), and [Checkout](#) sites. Patreon does not receive your full card number at this time. Payment processors provide us with a token that represents your account, your card's expiration date, card type and the last four digits of your card number. If you are required to provide

your name and email address to the payment processor then they also provide us with that information.

We collect and process information about the creators you support, the level at which you support them, what benefits you receive and how often you support them. As a patron, if you select a benefit tier with a physical benefit then you will provide your shipping information, including phone number, so the creator or Patreon can ship you the benefit or provide updates related to the shipment.

## Creators

A creator is someone who creates and provides content for their patrons through Patreon's membership platform. To become a creator, you must create a page that describes what you are creating and any benefits you are offering. To receive payouts you have to create an account with one of our payment partners: PayPal, Stripe or Payoneer. We may also require your bank account information to process payouts. You must also provide us with additional information for tax purposes. Depending on your location you may have to fill out a form with some combination of your:

- First and Last Name

- Address
- Social Security Number or Employer Identification Number
- Country of Citizenship
- Foreign Tax Identification Number
- Date of Birth
- Your Nonprofit Registration Number, if you are a nonprofit business
- Bank Account Information for Payouts
- Phone Number

## **Additional Information We Collect**

### **Automatically Collected Information**

We collect information automatically as you navigate the site or through our third-party analytics providers. We may store usage information such as the type of device you use to access Patreon, your operating system, browser type, IP address, device ID, the pages you visit or request, links clicked, referring sites, user interactions and your search terms. We also derive your location from your self-disclosed country, your IP address and your payment card.

### **Forums and Messaging**

When you participate in a forum, we

collect the comments you make as well as record how many times users visit, the activity on the site, where users have replied, with whom they've communicated, private messages, IP address and from which location the user was last logged in. We use **Discourse** and **Discord** to help us host and operate our Forums. This means that they may access your information to help provide the Forum. You can find their privacy policies hyperlinked above.

## User Surveys

From time to time, we may solicit your participation in user surveys. In order to better understand and serve our user base, we may ask you for demographic information, including information related to your gender, ethnicity, race, age, sexual orientation, earnings and accessibility, which you may choose to share or not. We collect such information to ensure we provide fair and equal access to our services and to showcase creators to patrons for greater discoverability. We will store your survey responses as and when you participate in the surveys.

## Event Information

We may request information from you at in-person and online events. This is done to better tailor the event experience to those attending. This information may

include your name, email address, payment details, mobile phone number and QR code, demographic information, social media and other online accounts you maintain, details around the types of works you create, and survey or feedback responses.

## Blogs

We may collect and store your email address, your comments and your profile information from our blog sites to better understand your interests and improve our services to you.

# Information Collected by Third Parties

## Cookies

We use Cookies on our website that collect information to allow us and third parties to understand your use of Patreon. Please see our [cookie policy](#) for more information on our use of cookies on Patreon.

## Social Media Features and Widgets

We use social media features, including the Facebook Like button and widgets, such as the Share button or similar interactive mini-programs that run on Patreon. If you provide your social media information to us, we may use it to



interact with you on these social networks. These features may collect your IP address and other personal data, including which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or directly on Patreon. Your interactions with these Features are governed by the privacy policy of the company providing it. For more information on the technologies used by these social networks, please refer to their specific privacy notices. We have provided links to the most used social networks below for easy reference:

- Facebook:  
<https://www.facebook.com/about/privacy/>
- Twitter: <https://twitter.com/privacy>
- YouTube:  
<https://policies.google.com/privacy>
- Instagram:  
<https://help.instagram.com/155833707900388>
- Twitch:  
<https://www.twitch.tv/p/legal/privacy-notice/>

## How We Use Your Information

We process your information to:

- verify your identity to comply with US federal, state, and international

laws

- allow you to sign in to your account
- • allow you to support a creator's membership programme on Patreon
- process membership payments and payouts
- send merchandise to your shipping address
- send you emails relevant to your usage, as controlled by your email preferences
- reply to your questions
- provide to you existing and enhanced services related to your Patreon account
- promote your Patreon account for greater discoverability
- spotlight and celebrate creators
- market Patreon products and services to you or to audiences similar to you based on your networks and common factors that others have with you, unless you opt out, as controlled by your email preferences
- understand how you use the service and create better tools for creators to serve patrons
- conduct research and development to improve Patreon and develop future products
- prevent fraud and abuse on Patreon
- provide you with reasonable accommodation, if you notify us of a disability

## Information We Share with Creators

By becoming a patron of a creator, you agree to have the following information shared with that creator:

- your name and email address, and other profile information you've provided
- any messages you send creators through Patreon
- your physical address, city, state, and country
- your phone number, when you have signed up to support a creator who engages with you via text messages, when you are receiving a benefit that requires shipping, or when you have signed up for event notifications via text
- all information about your pledge, including amount and start date but not your full payment card information
- some aggregated and anonymised data about how you use Patreon that cannot be linked back to you or to any individual user

Creators agree to the terms of our Data Processing Agreement (DPA) when they

start their membership programme. This DPA is called the Creator Privacy Promise. The Creator Privacy Promise is a creator's promise to protect the privacy of their patrons during and beyond their Patreon relationship. You can view a copy of the [Creator Privacy Promise here](#).

## Information We Share with Third Parties

We never sell your information to third parties. We will only share data with third parties, other than with creators, under the following circumstances:

- with your consent, to creators' service providers, to deliver benefits, such as shipping packages to you. You should read these service providers' privacy policies to see how they use and share your data.
- with our service providers, who are companies that are contractually engaged with us to provide us with services, such as order fulfilment, email management, analysing data trends, credit card processing, multi-currency settlement solutions, increasing our brand awareness and user engagement with marketing initiatives, and fraud detection and prevention. These companies may

have access to your data to perform their services, and are obligated by contract to safeguard any of your data they receive from us to the same extent that Patreon protects it.

- to protect the security or integrity of Patreon as well as to protect the rights, property and safety of Patreon, its employees, users or others if we believe that disclosure is reasonably necessary to comply with a law, regulation or other valid legal process (e.g. subpoenas or warrants served on Patreon). If we are going to release your data, we will do our best to promptly notify you by email unless we are prohibited by law from doing so.
- in connection with the sale, merger, bankruptcy, sale of assets or reorganisation of our company. We will notify you if a different company receives your data. The promises in this privacy policy apply to any data transferred to a new entity.
- with third-party apps used by creators to help run their membership programmes. There is a list of apps in our [apps directory](#). While we try to keep this list up to date, we often experiment with new third-party app providers and this list may not be exhaustive.
- with partners in our Partners Directory who may have access to

your data to perform their services and who are obligated by contract to safeguard any of your data they receive from us to the same extent that Patreon protects it.

## Information Patreon Collects from Third Party Apps

When you create a Patreon account, you can elect to connect your social account(s) (e.g. Twitter, Facebook, Google, YouTube and Twitch) with Patreon and we will collect and store some social information from those platforms, such as:

- follower or subscriber counts
- post or upload counts
- view, like, and comment counts

This social information allows us to provide you with a better Patreon experience and also helps guide future development of Patreon. We use this data to:

- help creators and patrons find each other on Patreon
- assess how to make creators more successful on Patreon
- analyse and describe our business

# Information We Share with the Public

The following information is publicly accessible:

- your profile and your social media links and location if you add that information
- the creators you support are publicly displayed by default. If you flag your account as private, we will not display the creators you support
- any posts, likes or comments you make
- your aggregated or anonymised usage data in blog posts, press releases or in other ways to share information about Patreon's usage. Aggregated or anonymised data cannot be linked back to any individual Patreon user
- monthly pledge value and goals that creators choose to make public
- number of patrons

## Your Preferences and Rights over Data

### Choosing Your Preferences

The Settings link is located by clicking on your avatar or profile at the top right-hand of your screen, after your log into

your Patreon account. Settings lets you see your account preferences. You can see and adjust your settings by viewing your preferences and, if you wish, by changing your selections.

## Marketing Activities

By agreeing to our terms of use, you expressly agree that Patreon may:

- provide you with information about your service, service enhancements or new Patreon products while you are on our website or using our apps.
- send you messages regarding your existing service or enhancements related to your existing service when you are off our platform via email or via text if you have signed up for a service or event notification that uses text messages.
- send you messages related to services we provide which are separate from your existing service via email, which you may opt out of.
- market Patreon to you and audiences similar to you based on your networks and common factors that others have with you unless you opt out.
- send you marketing emails or texts if you don't have a Patreon account but have consented to receiving such messages, which you may opt out of.
- ask for demographic information to



spotlight and celebrate creators.

- promote your account for greater discoverability.
- ship physical items to you via mail as part of a promotional activity.

## Opting out of Marketing

You may object to the use of your data for marketing purposes at any time, free of charge, when we collect your personal information and in every marketing communication. You may also object to the use of your data for marketing upon creation of your account or anytime thereafter by opting out [here](#).

Opting out will stop marketing emails. Please allow up to 30 days for your opt-out request to be processed. If you have an account with Patreon, you will continue to receive service-related emails and texts if you have opted into receiving texts. You will also continue to receive service-related shipments of benefits to the designated delivery address.

We will never sell your information to third parties for marketing purposes without your prior consent.

## Accessing, Updating or Exporting the Information in Your Account

You can access and update certain information associated with your account on the settings pages. Additionally, you

can delete your account or export your personal information by going to [privacy.patreon.com](https://privacy.patreon.com).

## Deleting Your Account

You may self-initiate a deletion of your account directly at [privacy.patreon.com](https://privacy.patreon.com) by clicking on the Make a Privacy Request button and submitting an "Erase" request. Please be aware that this action is final and cannot be reversed. If you would like to transport your data, please be sure to download your data first before you delete your account.

## Turning off Email Notifications

You can change your email notifications in your [email settings](#). While this allows you to stop many notification emails, we will still send some critical service emails.

## Turning off Mobile Notifications

If you download the Patreon App you may also receive notifications on your mobile device. These can be disabled in the App settings.

## Verification of Requests

Users maintain password-protected accounts with Patreon. If you submit a request to exercise your privacy rights, you will be asked to verify the request by logging in to your Patreon account.

If we are unable to verify your request then, for your protection, we reserve the

right to deny the request.

## **Compliance with EU Privacy Laws and Privacy Shield**

Patreon is an international company that complies with the General Data Protection Regulation (GDPR). We act as Data Controllers, as defined under the GDPR, and we process personal data based on our legitimate interests and for contractual necessity in providing you the Service, as described in "How We Use Your Information". We also process and share personal information based on notification and users' consent, which our users may revoke at any time.

Patreon relies on various legal bases to lawfully execute international transfers of personal information, including standard contract clauses approved by the European Commission.

Patreon complies with the EU-US Privacy Shield Framework and Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use and retention of personal information transferred from the European Union and Switzerland to the United States. Patreon has certified to the Department of Commerce that it

adheres to the Privacy Shield Principles. If there is any conflict between the terms in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles take precedence. To learn more about the Privacy Shield programme and to view our certification, please visit

<https://www.privacyshield.gov/>.

Under limited circumstances you may invoke binding arbitration before the Privacy Shield Panel. More Information about this arbitration process can be found at

<https://www.privacyshield.gov/article?id=G-Arbitration-Procedures>.

Patreon is responsible for the processing of personal information it receives or subsequently transfers to a third party acting as an agent on Patreon's behalf. Patreon complies with the Privacy Shield Principles for all onward transfers of personal information, including the onward transfer liability provisions.

With respect to the personal information received or transferred pursuant to the Privacy Shield Frameworks, Patreon is subject to the regulatory enforcement powers of the US Federal Trade Commission.

## Compliance with

# California Privacy Laws

Patreon's headquarters are located in California, USA, and we are subject to the California Consumer Privacy Act.

Effective 1 January 2020, the California Consumer Privacy Act (CCPA) allows California residents to request access to the specific pieces and categories of personal information that the business has collected about the consumer, the categories of sources for that information, the business or commercial purposes for collecting the information, and the categories of third parties with which the information was shared.

Patreon provides California residents and all users with the right to view, access or transport their information at the [Patreon Privacy Center](#). All users also have the right to submit a request for deletion of information by going to the [Patreon Privacy Center](#), clicking on the "Make a Privacy Request" button and requesting "Erase".

## Exercising Your Data Rights

Users in certain locations may have

certain rights under the General Data Protection Regulation (GDPR) or under the California Consumer Privacy Act (CCPA) regarding data that Patreon controls as a Data Controller as defined under the GDPR, including:

- the right of access to their personal data,
- the right to correct or rectify any inaccurate personal data,
- the right to restrict or oppose the processing of personal data,
- the right to erase or delete their personal data,
- the right to personal data portability, and
- the right to opt-out of the sale of personal information.

You can exercise rights over your data on Patreon in the following ways:

- accessing, reviewing, modifying, and updating your data by logging into your account at Patreon and going to your [account settings](#).
- viewing our privacy policy or viewing our data practices by going online to our [Patreon Privacy Center](#), where the Data Practices tab describes how we use your data, and the Policies tab shows you our privacy policy.
- downloading your data to port it, or deleting your data altogether, by

clicking on the "Make a Privacy Request" button at the [Patreon Privacy Center](#).

- deleting a previously-disabled account by emailing Patreon at [privacy@patreon.com](mailto:privacy@patreon.com).
- opting out of marketing by entering your email address at this [opt out link](#).
- going to [FAQ support](#) online for data-related issues, or calling our U.S. toll-free phone number at 1 (833) 972-8766.

If you are unable to log into your account, and are unable to recover your account with a password reset in order to lodge your privacy request, then you may reach out to [privacy@patreon.com](mailto:privacy@patreon.com). We reserve the right to decline you access to or recovery of your account, at our discretion, to prevent an unauthorized takeover of your account.

## Account Holders with Disabilities

Patreon is committed to accessibility for its account holders with disabilities. If you are having difficulty accessing your account, please email us at [accessibility@patreon.com](mailto:accessibility@patreon.com) for assistance.

## Contacting our Data Protection Officers

If you have privacy concerns or questions, you can contact our European or US Data Protection Officers (DPOs) via email at [privacy@patreon.com](mailto:privacy@patreon.com).

You may also mail a letter to the DPO with your questions.

- For US users, post should be sent to "Patreon Privacy Team, 600 Townsend Street, Suite 500, San Francisco, CA 94103"
- For EU users, post should be sent to "Patreon Privacy Team, Patreon Ireland Limited, Suite 3, One Earlsfort Center, Lower Hatch Street, Dublin 2, Ireland"

## Establishing an Authorized Agent

You may designate an authorised agent to make a request on your behalf. In order to designate an authorised agent to make a request on your behalf, you must provide a valid power of attorney, the requester's valid government ID and the authorised agent's valid government ID. Please contact [privacy@patreon.com](mailto:privacy@patreon.com)



with your request. To protect your information from account takeover, we may decline access to or recovery of your account at our discretion.

## **Prohibition against Discrimination**

We do not discriminate against users who exercise their privacy rights.

## **Our Data Retention Period**

We retain your account information for ten years after your account is last active unless you delete, or you request that we delete, your account. We may continue to retain some information even after you delete your account if we are required to do so in order to comply with various laws.

## **Security**

The security of your personal information is important to us and we follow industry standards to protect it. You can learn more on our [Security Policy](#) page.

## Children

Patreon is not intended for children under the age of 13 and children may not create an account or otherwise use Patreon.

## Changes

We may sometimes make changes to this policy. If we make material changes that adversely affect your rights under this policy, we will let you know by posting an announcement on the site or sending you an email in advance of the changes coming into effect. Continuing to use Patreon after a change to this policy means you accept the new policy. If you have any questions, please email [privacy@patreon.com](mailto:privacy@patreon.com).

You can find the old Privacy Policy [here](#).

- [Help Center & FAQs](#)
- [App Directory](#)
- [Creator Blog](#)
- [Community Guidelines](#)
- [Terms of Use](#)

- [Privacy Policy](#)



**[Our Approach to Privacy](#)**   **[Return to Main Site](#)**